

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
PHILIPPE BUHANNIC and PATRICK	:	
BUHANNIC,	:	
	:	
Plaintiffs,	:	
	:	
-against-	:	Civil Action No.: 18-cv-5371 (ER)
	:	
PIERRE SCHROEDER; PIERO GRANDI;	:	
FRANK PLACENTI; ROBERT TRUDEAU;	:	
TCV VI L.P.; TCV MEMBER FUND, L.P.;	:	
JAY HOAG; and RICK KIMBALL,	:	
	:	
Defendants.	:	
-----	X	
PHILIPPE BUHANNIC and PATRICK	:	
BUHANNIC,	:	
	:	
Plaintiffs,	:	
	:	
-against-	:	Civil Action No.: 18-cv-5372 (ER)
	:	
TRADINGSCREEN INC.; PIERRE	:	
SCHROEDER; PIERO GRANDI; FRANK	:	
PLACENTI; ROBERT TRUDEAU; TCV VI,	:	
L.P.; and TCV MEMBER FUND, L.P.,	:	
	:	
Defendants.	:	
-----	X	
PHILIPPE BUHANNIC and PATRICK	:	
BUHANNIC,	:	
	:	
Plaintiffs,	:	
	:	
-against-	:	Civil Action No.: 18-cv-7997 (ER)
	:	
TRADINGSCREEN INC.; PIERRE	:	
SCHROEDER; PIERO GRANDI; FRANK	:	
PLACENTI; ROBERT TRUDEAU; TCV VI,	:	
L.P.; and TCV MEMBER FUND, L.P.,	:	
	:	
Defendants.	:	
-----	X	

-----	X	
PHILIPPE BUHANNIC,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	
TRADINGSCREEN INC.,	:	Civil Action No.: 18-cv-9351 (ER)
	:	
Defendant.	:	
	:	

-----	X	
PHILIPPE BUHANNIC,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	Civil Action No.: 18-cv-9447 (ER)
TRADINGSCREEN INC.; PIERRE	:	
SCHROEDER; PIERO GRANDI; FRANK	:	
PLACENTI; ROBERT TRUDEAU; TCV VI,	:	
L.P.; and TCV MEMBER FUND, L.P.,	:	
	:	
Defendants.	:	

-----	X	
PHILIPPE BUHANNIC,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	Civil Action No.: 18-cv-10170 (ER)
TRADINGSCREEN INC.; PIERRE	:	
SCHROEDER; PIERO GRANDI; FRANK	:	
PLACENTI; ROBERT TRUDEAU; TCV VI,	:	
L.P.; TCV MEMBER FUND, L.P.; JAY	:	
HOAG; and RICK KIMBALL,	:	
	:	
Defendants.	:	

-----	X
-------	---

DECLARATION OF JOHN M. VASSOS
IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS

Pursuant to 28 U.S.C. § 1746, JOHN M. VASSOS declares as follows:

1. I am admitted to the bar of this Court and I am a partner at the firm of Morgan, Lewis & Bockius LLP, counsel for Defendants TradingScreen Inc., Pierre Schroeder and Piero Grandi in the above-captioned matters. I submit this declaration and the accompanying exhibits in support of the Motion to Dismiss submitted by defendants TradingScreen Inc., Pierre Schroeder, Piero Grandi, Frank Placenti, Robert Trudeau, TCV VI, L.P., TCV Member Fund, L.P., Jay Hoag, and Rick Kimball (collectively, “Defendants”).

2. Attached hereto as Exhibit 1 is a copy of an excerpt from the May 17, 2016 Transcript in the Delaware Chancery Court Action *Schroeder v. Buhannic*, Civ. A. No. 12328-VCL.

3. Attached hereto as Exhibit 2 is a copy of the Order Dismissing Claims as Moot with Prejudice in the Delaware Chancery Court Action *Schroeder v. Buhannic*, Civ. A. No. 12328-VCL.

4. Attached hereto as Exhibit 3 is a copy of relevant excerpts of the transcript from a hearing held on May 4, 2017 in the AAA proceeding *Buhannic v. TradingScreen, Inc.*, IDCR Case No. 01-16-0002-7810.

5. Attached hereto as Exhibit 4 is a copy of the award issued by the three-member panel of arbitrators in the AAA proceeding *Buhannic v. TradingScreen, Inc.*, IDCR Case No. 01-16-0002-7810.

6. Attached hereto as Exhibit 5 is a copy of the Decision and Order dated December 12, 2017, filed in the New York State Supreme Court action *Buhannic v. TradingScreen, Inc.*, Index No. 653624/2016 (the “New York State Court Action”).

7. Attached hereto as Exhibit 6 is a copy of the transcript of proceedings held on May 15, 2018 in the New York State Court Action, and the New York State Court's Decision on the Record, So Ordered on June 7, 2018.

8. Attached hereto as Exhibit 7 is a copy of the transcript of proceedings held on June 7, 2018 in the New York State Court Action.

9. Attached hereto as Exhibit 8 is a copy of a Decision and Order issued in the New York State Court Action, dated December 6, 2018.

10. Attached hereto as Exhibit 9 is a copy of the Amended Complaint filed by Mr. Buhannic in the action *Buhannic v. Schroeder*, Case No. 18-cv-05371 (S.D.N.Y. 2018) (Dkt. No. 18).

11. Attached hereto as Exhibit 10 is a copy of the Verified Amended Complaint filed in the New York State Court Action, dated October 6, 2016.

12. Attached hereto as Exhibit 11 is a copy of a decision dated January 10, 2018 issued by the Court of Chancery of the State of Delaware in the case captioned *Schroeder v. Buhannic*, C.A. No. 2017-0746-JTL.

13. Attached hereto as Exhibit 12 is a copy of the Complaint filed by Mr. Buhannic in the action *Buhannic v. TradingScreen Inc.*, Case No. 18-cv-05372 (S.D.N.Y. 2018) (Dkt. No. 1).

14. Attached hereto as Exhibit 13 a copy of the complaint filed in the action *Buhannic v. TradingScreen*, Case No. 655848/2017.

15. Attached hereto as Exhibit 14 a complaint filed in the action *Buhannic v. TradingScreen Inc.*, Index No. 652034/2017 (the "New York State Court Books and Records Action").

16. Attached hereto as Exhibit 15 is a copy of the Amended Complaint filed by Mr. Buhannic in the action *Buhannic v. TradingScreen Inc.*, Case No. 18-cv-07997 (S.D.N.Y. 2018) (Dkt. No. 3).

17. Attached hereto as Exhibit 16 is a copy of the Complaint filed by Mr. Buhannic in the action *Buhannic v. TradingScreen Inc.*, Case No. 18-cv-09351 (S.D.N.Y. 2018) (Dkt. No. 1).

18. Attached hereto as Exhibit 17 is a copy of a decision and order issued by the New York Supreme Court Appellate Division, First Department in the action *Buhannic v. TradingScreen, Inc.*, dated January 15, 2019.

19. Attached hereto as Exhibit 18 is a copy of the Complaint filed by Mr. Buhannic in the action *Buhannic v. TradingScreen, Inc.*, Case No. 18-cv-09447 (S.D.N.Y. 2018) (Dkt. No. 1).

20. Attached hereto as Exhibit 19 is a copy of the Complaint filed by Mr. Buhannic in the action *Buhannic v. TradingScreen Inc.*, Case No. 18-cv-10170 (S.D.N.Y. 2018) (Dkt. No. 1).

21. Attached hereto as Exhibit 20 is a copy of a motion filed by Mr. Buhannic in the New York State Court Action, dated September 26, 2017.

22. Attached hereto as Exhibit 21 is a copy of an Indemnification Agreement between Mr. Buhannic and TradingScreen Inc., dated September 11, 2007.

23. Attached hereto as Exhibit 22 is a copy of a brief filed by Mr. Buhannic in the New York State Court Books and Records Action, dated January 10, 2019.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on January 15, 2019
New York, New York


John M. Vassos